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RICHARD W. WILSON
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

BZ

10
11 CORBIS CORPORATION,

12 Plaintiff,

13 v.

14 EFUNDS CORPORATION,

15 Defendant.
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C 06 0673
CASE NO.

COMPLAINT FOR COPYRIGHT
INFRINGEMENT AND VIOLATION OF
THE DIGITAL MILLENNIUM
COPYRIGHT ACT; DEMAND FOR
JURY TRIAL

1 Plaintiff Corbis Corporation, through its attorneys, complaining of Defendant eFunds
2 Corporation alleges as follows:

3 1. This is a civil action seeking damages for copyright infringement and violations of
4 the Digital Millennium Copyright Act ("DMCA"). As explained below, Defendant has made
5 widespread and repeated use without permission of images owned or controlled by Plaintiff,
6 contrary to the copyright laws.

7 8 JURISDICTION AND VENUE

9 2. *Jurisdiction.* The Court has subject matter jurisdiction over this action pursuant
10 to 28 U.S.C., Sections 1331 and 1338(a), as this action involves claims brought under federal
11 law, the United States Copyright Act, 17 U.S.C. §§ 101 *et seq.* This Court has personal
12 jurisdiction over Defendant as it may be found to do business in the state of California.

13 3. *Venue.* Venue in this Court is proper pursuant to 28 U.S.C., Section 1391(c) and
14 1400(a), as Defendant is subject to personal jurisdiction in this judicial district.

15 16 INTRADISTRICT ASSIGNMENT

17 4. Because this action is an Intellectual Property Action within the meaning of Civil
18 Local Rule 3-2(c), the action is to be assigned on a district wide basis.

19 20 THE PARTIES

21 5. Plaintiff Corbis Corporation ("Corbis") is a Washington corporation with its
22 principal place of business at 710 Second Avenue, Suite 200, Seattle, King County, Washington.

23 6. Upon information and belief, Defendant eFunds Consultants, Inc. ("eFunds") is a
24 corporation with its principal place of business at 8501 North Scottsdale Road, Suite 300,
25 Scottsdale, Arizona 85253.

BACKGROUND

7. Corbis is in the business of licensing background photographs and fine art images on behalf of itself and the photographers and other licensors it represents. Generally, the images in Corbis' collection were taken by professional photographers who earn most or all of their livelihoods from the licensing fees Corbis is able to obtain for their images. Many of the images in Corbis' collection are produced by well-known photographers, and the collection includes some of the most recognized images in contemporary society.

8. The images in Corbis' collection are the subject of copyright protection under the laws of the United States, and at considerable expense and effort, Corbis has protected images in its collection by systematically registering the copyrights to the images.

9. Corbis owns and operates a website located at the Internet address www.corbis.com. At Corbis' website, professional users are able to search hundreds of thousands of images from Corbis' collection and then pay to license the images for specific commercial uses.

10. Upon information and belief, eFunds is a company incorporated in Delaware and based in Arizona that is engaged in the business of providing electronic transaction processing services, check authorization, account verification, fraud detection, and other services to financial services, retailers, government, and the telecom industry. At all times relevant hereto, eFunds owned and operated a website located at www.efunds.com.

11. Upon information and belief, eFunds is engaged in substantial, continuous, and systematic business activities within the state of California. Upon information and belief, eFunds has purposefully availed itself of the privilege of conducting business in the state of California by conducting said business activities in California. Further, upon information and belief a portion of the infringing activities alleged herein occurred in the state of California because eFunds purposefully directed its www.efunds.com website to California in an effort to advertise its services and solicit business in the state of California.

12. Upon information and belief, on an as yet unknown date, eFunds or its agent visited Corbis' website, and without authorization, downloaded or copied numerous Corbis

1 images that had previously been registered with the United States Copyright Office. Then
2 eFunds or its agent uploaded these same images to its www.efunds.com website for display on its
3 website, as part of the marketing and advertising material presented on that site in order to attract
4 business to eFunds. The same images were included on the www.efunds.com website at least
5 until September 30, 2005.

6 13. Attached hereto as Exhibit A are true and correct copies of each of the Corbis
7 images previously registered with the Copyright Office, with screen shots taken from the
8 www.efunds.com website depicting these images from Corbis' collection that were used by
9 eFunds without authorization and displayed on its website.

10 14. At all relevant times hereto, eFunds displayed these copyright images on its
11 website without license or other authorization from Corbis.

12 15. Attached hereto as Exhibit B is a chart identifying the United States Copyright
13 Office registration certificate numbers and registration dates for the Corbis images displayed in
14 Exhibit A, evidencing that Corbis owns or controls the registered copyrights to the images that
15 were displayed on the www.efunds.com website.

16
17 **FIRST CLAIM FOR RELIEF- COPYRIGHT INFRINGEMENT**

18 16. Corbis repeats and realleges the allegations of Paragraphs 1 through 15 as if fully
19 set forth herein.

20 17. Corbis holds valid and exclusive registered copyrights to the images that are the
21 subject of this action and that are evidenced by the copyright registration certificates referenced
22 by Exhibit B.

23 18. Upon information and belief, eFunds reproduced, distributed and displayed those
24 images without Corbis' authorization.

25 19. The actions and conduct by eFunds as described above infringe upon the
26 exclusive rights of Corbis granted by Section 106 of the Copyright Act, 17 U.S.C. § 106, to
27 display, reproduce, and distribute the registered copyright works to the public.
28

1 20. Such actions and conduct by eFunds constitute copyright infringement under
2 Section 501 of the Copyright Act, 17 U.S.C. § 501.

3 21. As a result of the copyright infringement described above, Corbis is entitled to
4 relief including, but not limited to, injunctive relief, actual or statutory damages, statutory costs
5 and attorney's fees, and prejudgment interest.

6
7 **SECOND CLAIM FOR RELIEF- DMCA VIOLATION**

8 22. Corbis repeats and realleges the allegations of Paragraphs 1 through 21 as if fully
9 set forth herein.

10 23. All of the images that are the subject of this lawsuit were displayed on the
11 www.corbis.com website with corresponding copyright management information ("CMI"). Upon
12 information and belief, when eFunds or its agents duplicated and displayed the subject images on
13 its www.efunds.com website, it removed the CMI from each of the 6 unique images, and in each
14 of the 40 instances of those images, used by eFunds. The removal of the CMI from each of these
15 images in order to induce, enable, facilitate or conceal eFunds' infringement of those images, as
16 described above, constitutes a violation of the Digital Millennium Copyright Act, 17 U.S.C. §
17 1202(b).

18 24. As a result of the conduct described above, plaintiff is entitled to relief including,
19 but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorneys'
20 fees, and prejudgment interest.

21
22 **RELIEF REQUESTED**

23 WHEREFORE, Corbis prays for relief as follows:

24 1. For an order permanently enjoining Defendant from infringing Corbis'
25 copyrighted images pursuant to Section 502 of the Copyright Act, 17 U.S.C. § 502, and
26 permanently enjoining Defendant from displaying Corbis' copyrighted images pursuant to the
27 DMCA, 17 U.S.C. § 1203(b);
28

2. For an award of Defendant's profits and for damages in such amount as may be found, or for statutory damages of (a) not less than \$750 or more than \$30,000 per image pursuant to 17 U.S.C. § 504(c)(1) or, upon a finding of willful infringement pursuant to 17 U.S.C. § 504(c)(2), up to \$150,000 per image, and (b) not less than \$2500 or more than \$25,000 per image pursuant to 17 U.S.C. § 1203(c)(3)(B);

3. For an award of costs, pursuant to 17 U.S.C., Sections 505 and 1203(b)(4);

4. For an award of reasonable attorneys' fees, pursuant to 17 U.S.C., Sections 505 and 1203(b)(5);

5. For an award of prejudgment interest on the amount of any award to Plaintiff; and

6. For such other and further relief as the Court deems just and equitable.

Dated: January 30, 2006

QUINN EMANUEL URQUHART
OLIVER & HEDGES, LLP

By



Claude M. Stern
Attorneys for Plaintiff
Corbis Corporation

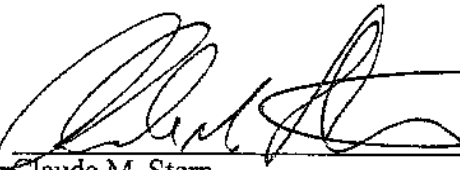
DEMAND FOR JURY TRIAL

Plaintiff Corbis Corporation hereby demands a jury trial on all issues properly tried to a jury.

Dated: January 20, 2006

QUINN EMANUEL URQUHART
OLIVER & HEDGES, LLP

By:


Claude M. Stern
Attorneys for Plaintiff
Corbis Corporation

CERTIFICATION OF INTERESTED PARTIES

Pursuant to Civil L.R. 3-16, the undersigned certifies that as of this date, other than the named parties, there is no such interest to report.

Dated: January 30, 2006

QUINN EMANUEL URQUHART
OLIVER & HEDGES, LLP

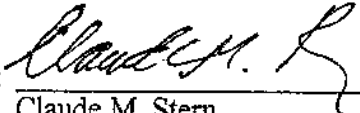
By: 
Claude M. Stern
Attorneys for Plaintiff
Corbis Corporation

Exhibit A



T-186-0197 | RM | © Cameron/CORBIS

IMAGE URL http://www.efunds.com/images/us_solutions_right.gif

Page URL <http://www.efunds.com/us/en/solutions/index.cnt>

Solutions

Put the full power of eFunds to work on your top issues

Increase revenue, reduce costs, enhance technology and speed up efficiency? You can apply the full power of eFunds' solutions to your business. eFunds' solutions are designed to help you achieve your business goals. eFunds' solutions are designed to help you achieve your business goals.

Our... If you don't need us to solve your problem for you, that's fine too. At the heart of eFunds' solutions is our ability to help you determine whether to engage eFunds as a single vendor or as a multi-vendor solution. eFunds' solutions are designed to help you achieve your business goals. eFunds' solutions are designed to help you achieve your business goals.

Financial support - We provide a complete, turnkey solution for your business. eFunds' solutions are designed to help you achieve your business goals. eFunds' solutions are designed to help you achieve your business goals.

- More than 77,000 retail locations and more than 10,000 financial services providers use our robust decision support services.
- Our solutions are used by more than 5 billion consumers (more than 1 billion from financial, retail and government sources).

Financial support - eFunds is an FFI processing and software maker with expertise in ATM, ACH, point-of-sale data and credit, solutions that and related services.

- We're based in the FFI industry for nearly 20 years.
- Worldwide, our software is used to process more than 15 billion FFI transactions annually.

Global eFunds solutions - We provide a complete, turnkey solution for your business. eFunds' solutions are designed to help you achieve your business goals. eFunds' solutions are designed to help you achieve your business goals.

ACH Customer Service - We are one of the leading ACH providers in the world, with our expertise and experience in managing your ACH program. eFunds' solutions are designed to help you achieve your business goals. eFunds' solutions are designed to help you achieve your business goals.

- 17,500 ACHs throughout the US and Canada
- One of the fastest growing ACH providers in Canada
- Named "Best Provider in ACH" by the ACH Association in 2005.

For more information...

Contact us for solutions or visit us at www.efunds.com or call 1-800-822-0027.



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IMAGE URL http://www.efunds.com/images/us_solutions_right.gifPage URL http://www.efunds.com/us/en/solutions/comp_a2z/index.cnt

Solutions

A to Z product listing

Here it is - the complete listing of all products and services under each fund's category. Simply use our key word search to go to a more detailed description.

Risk Management

efunds' Risk Management solutions are focused on providing risk and fraud while strengthening and extending your relationship with customers. With our robust data and tools, you can better understand your customers' risk profile, identify potential risks, and take action to mitigate them. The result is improved customer acquisition and retention, reduced fraud and loss, and improved cost efficiency and compliance for Risk Management.

Asset Report

Asset Report lets you know if your staff is missing important details regarding mutual fund investments. It provides information... if they are not taking an hourly look at it, it helps you avoid unnecessary risk and keep your new account opening.

Client/Investor

efunds' Client/Investor solutions are focused on providing the best client service. It helps provide of fund education and supports processing solutions for other fund, helping them grow their business.

Investment Solutions

Investment Solutions provides a complete overview of your investment solutions. It's a comprehensive solution for fund investors that helps you identify your clients' needs and offers them the best investment solutions.

Investment Solutions

Investment Solutions helps financial services businesses identify and show potential clients the best investment solutions.

Investment Solutions

Investment Solutions provides a complete overview of your investment solutions. It's a comprehensive solution for fund investors that helps you identify your clients' needs and offers them the best investment solutions.

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Investment Solutions provides a complete overview of your investment solutions. It's a comprehensive solution for fund investors that helps you identify your clients' needs and offers them the best investment solutions.

The screenshot displays the A to Z by Market website. The header includes the site's name and a navigation bar with links like Home, About Us, Contact Us, and a search bar. The main content area is titled 'Solutions' and lists several market segments: Financial Institutions, Financial Services Companies, Retail, e-Commerce, Government, and Networks. Each segment has a brief description of the services provided. The footer contains copyright information for 2004 and a disclaimer about the information being for informational purposes only.

A to Z by Market

Financial Institutions
Including retail and commercial banks, regional banks, community banks, credit unions, savings institutions, mutual funds, insurance, IPOs, bank platform providers, bank software providers, and bank services providers.

Financial Services Companies
Including hedge funds and investment banks, asset management companies, insurance companies, credit bureaus, credit card issuers, analysis houses, consumer finance companies, and equipment providers.

Retail
Including retailers, merchant accounts, third-party retail, manufacturer companies, and point-of-sale software and service providers.

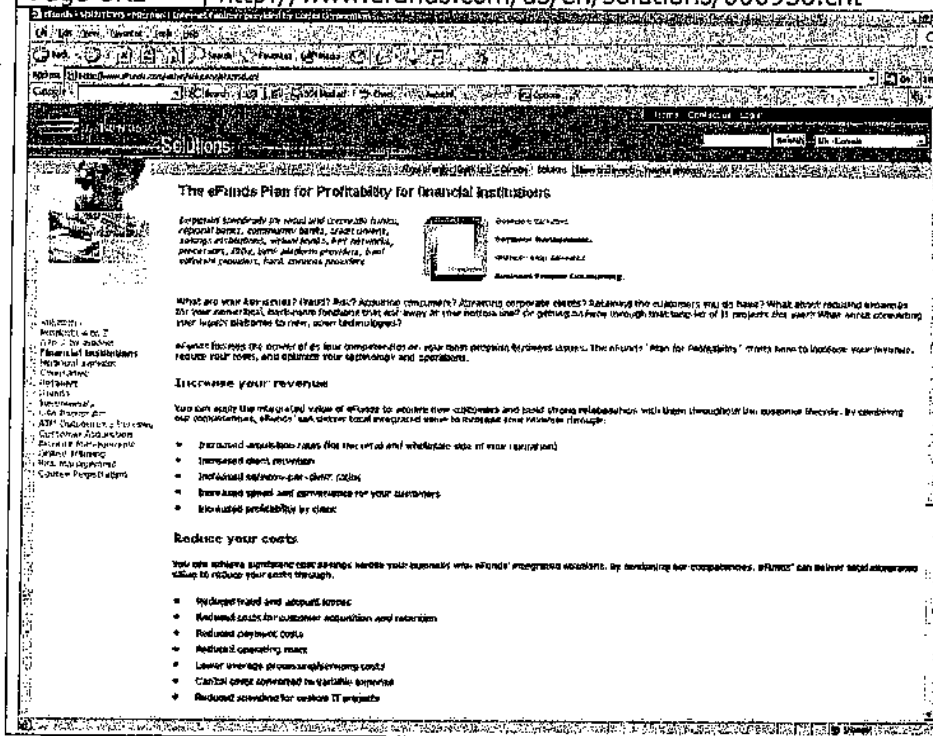
e-Commerce
Including retailers, internet merchants, merchant services, third-party credit card payment processors, e-commerce storefront and software providers, and electronic bill presentment/payment providers.

Government
Including federal, state, and local government bodies.

Networks
Including national and regional networks, providers, and transport processing providers.

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Solutions

The eFunds Plan for Profitability for financial services companies

Designed specifically for brokerage and investment firms, credit brokerage companies, insurance companies, credit bureaus, credit agencies, service bureaus, consumer finance companies, information providers.

What are your top three goals? Profit? Risk? Regulatory compliance? Increased competition from smaller players and from around the globe? What about scoring customers or expanding their portfolio with you? Do you have trouble reaching the customers you do want? Increasing your customer base? Reducing your operating costs? Aging infrastructure? Getting ready for the future? All of these goals are achievable with the eFunds Plan for Profitability.

Reduce your costs

You can achieve significant cost savings across your business operations with eFunds' integrated solutions. By combining our technology, eFunds can deliver total integrated value to reduce your costs through:

- Reduced front and support costs
- Reduced costs for customer acquisition and retention
- Reduced operating costs
- Reduced marketing costs
- Lower average processing/processing costs
- Capital costs converted to variable expense
- Reduced spending on customer IT projects

Increase your revenue

You can apply the integrated value of eFunds to acquire new customers and build strong relationships with them throughout the customer lifecycle. By combining our technology, eFunds can deliver total integrated value to increase your revenue through:

- Increased acquisition costs
- Increased client retention
- Increased services per client costs
- Increased cross and upsell revenue for your customers
- Increased profitability by client

Reduce your risk

You can achieve significant risk savings across your business operations with eFunds' integrated solutions. By combining our technology, eFunds can deliver total integrated value to reduce your risk through:

- Reduced front and support costs
- Reduced costs for customer acquisition and retention
- Reduced operating costs
- Reduced marketing costs
- Lower average processing/processing costs
- Capital costs converted to variable expense
- Reduced spending on customer IT projects



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IMAGE URL http://www.efunds.com/images/us_solutions_right.gifPage URL <http://www.efunds.com/us/en/solutions/000957.cnt>

Solutions

The eFunds Plan for Profitability for retailers

Customer satisfaction for retailers, revenue acquired, management efficiency, customer loyalty, and on-site software and service programs.

What are your key business goals? Profitable customer relationships, more profitable and profitable? New generation point-of-sale technology? Transaction control? eFunds' supply chain management? What about reducing expenses for your financial, time-wise business that will lower your bottom line? Getting halfway through that long list of IT projects, are you? What about connecting your supply chain to clear, open technology?

eFunds Group has opened its four eFunds programs to your most trading business system. The eFunds "Plan for Profitability" starts here to increase your revenue, reduce your costs and optimize your customer and employee.

Increase your revenue

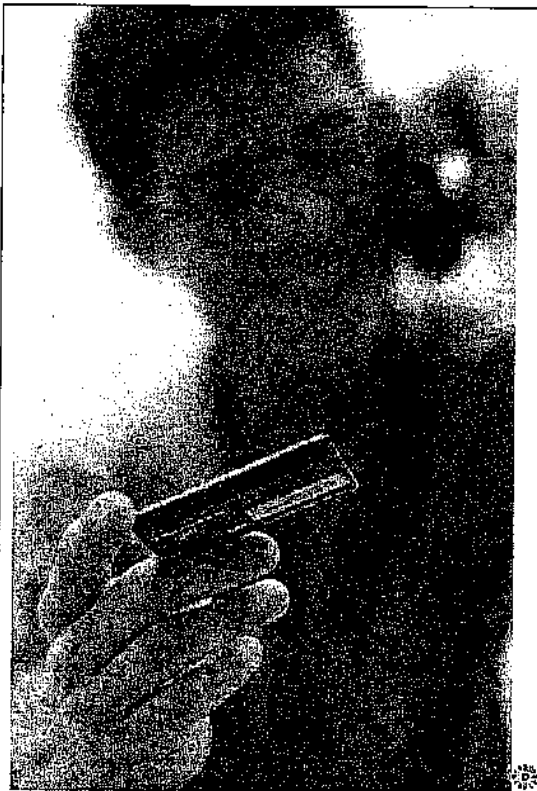
You can apply the integrated value of eFunds to acquire new customers and build strong relationships with them. By combining our comprehensive, eFunds' can deliver high-value services to increase your revenue through:

- Increased acquisition rates
- Increased customer retention
- Increased supply chain efficiency
- Increased speed and convenience for your customers
- Increased profitability per customer

Reduce your costs

You can achieve significant cost savings across your business operations with eFunds' integrated solutions. By combining our comprehensive, eFunds' can deliver high-value services to increase your revenue through:

- Reduced fixed and ongoing charges
- Reduced costs for customer acquisition and retention
- Reduced operating costs
- Reduced inventory costs
- Lower average processing and working costs
- Capital costs converted to variable expenses
- Reduced spending for various IT projects



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IMAGE URL http://www.efunds.com/images/us_solutions_right.gif

Page URL <http://www.efunds.com/us/en/solutions/demos/index.cnt>

Solutions

Here's where five great services come to life!

To use these demos, you will need the Shockwave® Flash™ Player plug-in installed on your browser. Click the Macromedia button at the end to download and install the new plug-in.

QualiCare®
Identify potential subscribers interested in managing their business relationships and cross-sell opportunities. QualiCare is available via Internet browser and by the same account used PC to via a desktop connection from your workstation.

FinancialEdge™
Provide the financial information of any type. One site that has liquid protection you can get with FinancialEdge™ from eFinancial.

InvestmentEdge™
Financial information can make sense. Adding a site with InvestmentEdge™, you get a high-powered risk assessment and cross-sell engine. Give the opportunity to share your customers to trust their accounts via the JALs.

LeadManagement
A comprehensive software solution that puts you in charge of the fast flow of information coming from your web and POS locations.

ClientConnect
The highly visible, scalable, and high-powered software solution connects and enables managers to manage the next generation of sales channels, and the probability of customer retention, sales channels.

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IMAGE URL http://www.efunds.com/images/us_solutions_right.gifPage URL <http://www.efunds.com/us/en/solutions/001169.cnt>

Solutions

WHAT others say about...

Our robust data for informed decisions

"The relationship with funds has helped our investment decisions significantly. The robust data provided by funds has helped us make more informed decisions and, consequently, our returns are higher because they're able to participate in the full economy." - Tom Roper, President of Roper's Investment Solutions business unit.

[Read the full news release.](#)

Our leading-edge payment management technology

"efunds' software helps Visa DPS be an essential part of Visa's payment processing and enables Visa to fully support its business without operational risk." - John Smith, President of Visa's Payment Processing business unit.

[Read the full news release.](#)

Our global resources for operational support

"We are always looking for new and innovative ways to make efficiency and reduce complexity for our clients. The new partnership with efunds will allow us to expand our services in global markets, increase our operational efficiency and develop new products to offer the most complete service and provide superior performance." - Tom Roper, President of Roper's Investment Solutions business unit.

[Read the full news release.](#)

"We are pleased to enter into an agreement with efunds as part of our ongoing strategy to provide full service customer relationship management to our clients. The relationship with efunds will allow us to expand our services in global markets, increase our operational efficiency and develop new products to offer the most complete service and provide superior performance." - Tom Roper, President of Roper's Investment Solutions business unit.

[Read the full news release.](#)



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IMAGE URL http://www.efunds.com/images/us_solutions_right.gif

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Solutions

USA PATRIOT Act Overview

On October 24, 2001, Congress passed the USA PATRIOT Act (Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act) to give the use of the U.S. financial system to those involved in terrorist financing and money laundering. The improved rule that the country's financial institutions are offering in reaction to the Patriot Act, must not be undervalued. All financial institutions are now required to play an integral part in the prevention of money fraud, the country's largest growing crime, and the war on terrorism, as a part of their money day business.

Section 206, known as the "Know Your Customer" or Customer Identification Program (CIP) requirement, of the USA PATRIOT Act, submitted by the US Treasury Department, is composed, calls for the following:

- All banks need to verify the identity of prospective customers to an extent that is reasonable and practicable.
- All new accounts need to be screened against the government's 500 worst list. While this list has not been released yet, the OFAC regulations still require that institutions accept reasonable due diligence to screen the OFAC and other published lists of sanctioned terrorists and terrorist organizations.
- A database of all electronic agents to be maintained that includes the account name, date of account opening, identification provided, and the method used to verify the identity. This information needs to be kept and data checked and maintained for 5 years following the closure of the account.
- Financial institutions must have a policy system for Identity Verification Programs.

ChexSystemsSM solutions & the USA PATRIOT Act

The USA PATRIOT Act regulation has added many burdens for financial institutions and compliance is an easy task. That's why ChexSystemsSM provides its verification to provide a comprehensive, easy-to-use and cost-effective solution that assists your institution in meeting the requirements of Section 206, 204(a) and 204(c), while still ensuring identity fraud and reducing your institution's risk.



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IMAGE URL http://www.efunds.com/images/us_solutions_right.gif

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Solutions

Customer acquisition solutions

Create a portfolio that's the envy of your competitors

Customer acquisition solutions from eFunds is a solution suite that can help you acquire new investors and develop a focused portfolio of active investors. eFunds provides you with the tools and resources you need to grow your business, including:

- Increased market share and sales
- Access to emerging investment markets
- Improved customer retention
- Reduced fraud and account abuse
- Improved per customer revenue
- Expanded market penetration
- Improved customer satisfaction

Break on new business

The customer acquisition solution suite delivers real-world benefits you can build on, such as:

- Increased market share and sales
- Access to emerging investment markets
- Improved customer retention
- Reduced fraud and account abuse
- Improved per customer revenue
- Expanded market penetration
- Improved customer satisfaction

Overcome market challenges, develop new customer relationships

Our customer acquisition solutions components are available as an integrated solution, as well as individually. All with full account management.

- Marketing for investment
- Full-service and managed client onboarding
- Analytics consulting for fraud reduction
- Security enhancements for fraud protection
- Analytics consulting to support up-sell and cross-sell business
- Reduced funding at the point of account activation
- Improved and customer satisfaction scores
- Customer application review
- Advanced customer support services
- CRM system integration, optimization, management, development, and maintenance
- Application data entry

Explore uncharted territory with confidence

Many investors/investors are hesitant to trade new markets or trading in the market previously considered - such as the "unbanked" consumer. eFunds' expertise is in identifying and capturing the best customers for you. We can help you develop market strategies, build up your and growing segments to a new level and provide relationships with each new investor.

Keep an eye on fraud



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IMAGE URL http://www.efunds.com/images/us_solutions_right.gifPage URL <http://www.efunds.com/us/en/solutions/categories/001455.cnt>

Solutions

Account management solutions

A wealth of opportunity in your own backyard

Customer relationships are hard to acquire, and sometimes even harder to keep. You also know that existing customers are most likely to buy additional products and services, and are generally less cost-effective to maintain. According to the American Bankers Association, the value of an existing customer is said to be five times the cost of a newly acquired customer.

The account management solution helps build a strong, long-term relationship with existing customers and increases the efficiency of your response to their requests. Customer service and retention programs that deliver measurable ROI. And, it focuses on helping you better manage risk and improve customer retention while taking advantage of new sales and cross-selling opportunities within your current checking account customers.

Industry-leading customer data and expert analytics

By leveraging eFunds' unique blend of industry-leading data and expert analytical services, this solution offers account management solutions that help you and your bank improve account management and retention efforts to increase customer availability. The solution is designed to supplement your staff with hard-earned resources, and enhance your existing customer relationship management (CRM) investments.

And all with seamless, flexible support

The account management solution suite provides support throughout the entire customer management lifecycle, including:

- Establishment of new account parameters based on MSF account privileges, card, bank, fees, etc.
- Identification and proactive retention of at-risk customers

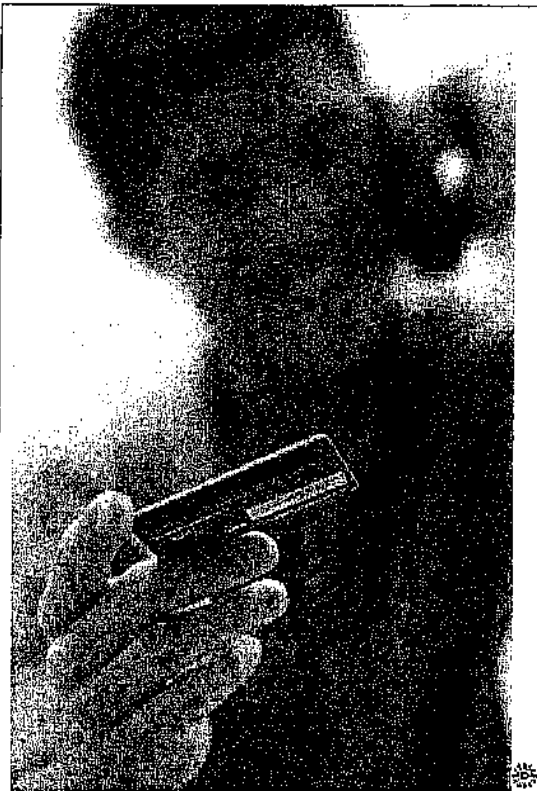
Integrated solution, individual flexibility

Our account management solution consists of flexible service modules, available as an integrated solution or individually, including:

- **Behavioral score solution**
An analytical score is built due to credit account holder behavior and management engagement action, highlights the driver of at-risk customers. Behavioral data is shared with your bank or other data so you can proactively manage the risk and opportunity in your customer portfolio.
- **Statistical modeling**
Supports current and forecast customer behavioral score information, created from a proprietary combination of external, proprietary, and internal data and your institution's data.

Reducing risk and opportunity

Financial institution growth and transaction level fraud continues to rise to levels in excess of \$12 billion annually, according to the American Bankers Association. Our comprehensive risk management solutions can help you control losses from fraud and mismanagement. Help you make the best decisions on customers such as MSF and other bank lines, that help you meet and maximize your bank goals.



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IMAGE URL http://www.efunds.com/images/us_solutions_right.gif

Page URL <http://www.efunds.com/us/en/solutions/categories/001550.cnt>

Solutions

Online Training

We are pleased to announce that the Web-based training for ClientCenterSM solution products has been expanded, and is now available for the following:

- ClientCenterSM Decision Products Overview
- 10 Verification
- New AccountCheckSM
- AccountCheck PlusSM
- Drivers LicenseCheckSM
- FraudFinderSM
- Office of Foreign Assets Control (OFAC)
- QualifaxSM
- Web Version of ClientCenterSM Overview Products

The new expanded Web-based training is available to efunds customers and employees. It has a 60-day seven day a week. Such flexibility provides training and the opportunity to view the training sessions at any time convenient for them and at their own pace.

Please refer to the online instructions for accessing / viewing the Web-based training sessions at the end of this document before accessing the training sessions. The following provides a description of each training session and a link to access each individual session.

ClientCenterSM Decision Products Overview

This session provides an overview of all ClientCenterSM solution products, describing how they work together to help reduce risk, and increase the measurability of a financial relationship with new account applicants. ClientCenterSM online training.

10 Verification

This session provides an overview of how 10 verification provides a comprehensive solution to help individuals comply with the Patriot Act Section 325(a) and OFAC regulations as well as a first line of defense against identity theft. Details include a review of the regulations, an overview of the 10 Verification 10 Verification online training.

New AccountCheckSM, AccountCheck PlusSM, and Drivers LicenseCheckSM

This session focuses on New AccountCheckSM, our foundation decision product. It also provides information regarding the add-on verification services AccountCheck PlusSM and Drivers LicenseCheckSM. Details on when and how to utilize these products is provided. AccountCheckSM, AccountCheck PlusSM, and Drivers LicenseCheckSM online training.

FraudFinderSM



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Solutions

Risk Management Solutions

Appropriation, assignment, determination, put three together with opportunity, and you're off to a risky start. When it comes to risk prevention, there's no one-size-fits-all solution. Turn to the solutions provided here. We offer a broad range of solutions to protect your financial future, from the most basic to the most advanced.

Take a FREE 10-Verification Test

Our risk management solutions include:

- ID Verification**
- Staff account working audits**
- Identity manipulation and fraud detector**
- Financial history augmentation**

ID Verification

Our web-based identity verification solution, ID Verification, is a comprehensive, easy-to-use and adaptable tool that enables financial institutions to verify the identity of prospective customers and increase customer loyalty during the new account opening process. ID Verification includes two separate identity verification and document verification services for new account opening. ID Verification provides compliance for the 2005 FDICIA (for Section 206 and 214) and CRA regulations, as well as an extensive identity fraud prevention tool.

Staff account working audits

After verifying identity and documentation if you open a new account, your institution can receive real-time data and decide if you should begin a new relationship. Creditworthiness is an important factor in your comprehensive identity verification service, which helps identify whose accounts have been opened for fraud and who might pose a risk to your institution.

Identity manipulation and fraud detector

Take risk assessment a step further with Qualidat, a sophisticated, real-time solution. Qualidat is a data and risk-of-the-art decisioning system that helps you not only identify an individual's manipulation information, but also provides the likelihood of their account being for fraud. As the same time, Qualidat enables your new-account representatives with detailed and detailed steps for account opening and cross-selling.

Financial history augmentation

Have customers who are potential customers for your institution? Use credit on them to see if there is no history to report. Yet, these same customers probably have credit and credit history. Credit history from various sources and the new credit history can be used to provide comprehensive credit data. Qualidat is a tool that helps you not only identify an individual's manipulation information, but also provides the likelihood of their account being for fraud. As the same time, Qualidat enables your new-account representatives with detailed and detailed steps for account opening and cross-selling.

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Solutions:

Course Registration

Select a course:

JAC General Training IELTS Preparation - Module 1 & 2	12
JAC General Training IELTS Preparation - Module 2 & 3	12
JAC Academic Preparation IEP Workshop - Agents Only & 12m	12

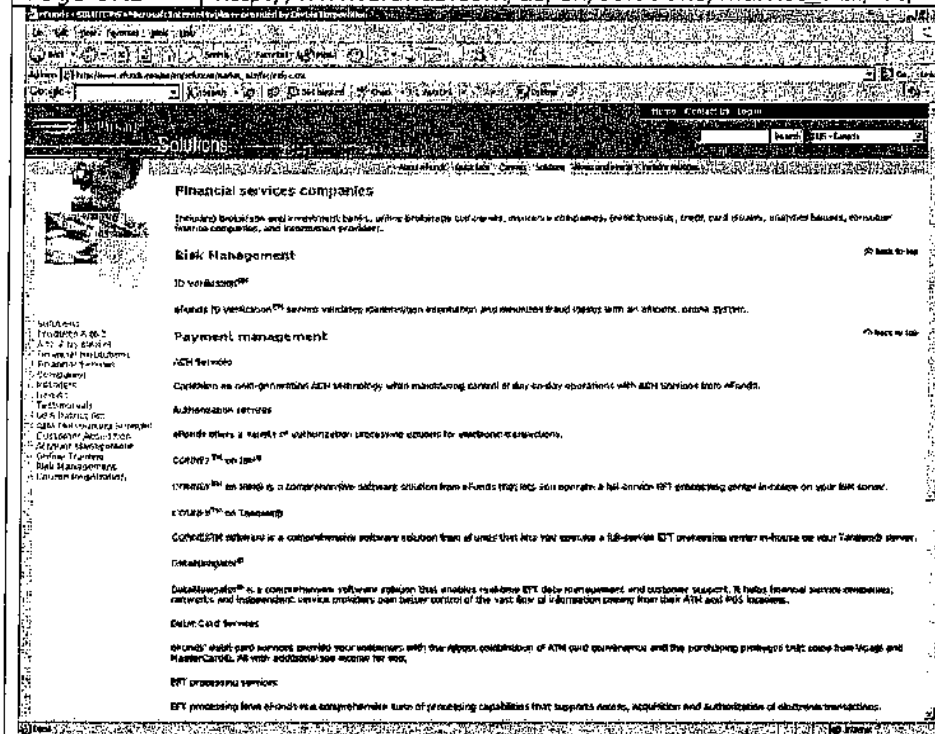
Choose Option:
☐ Register for course
☐ Cancel my course registration

Registration Information:
no more registrations

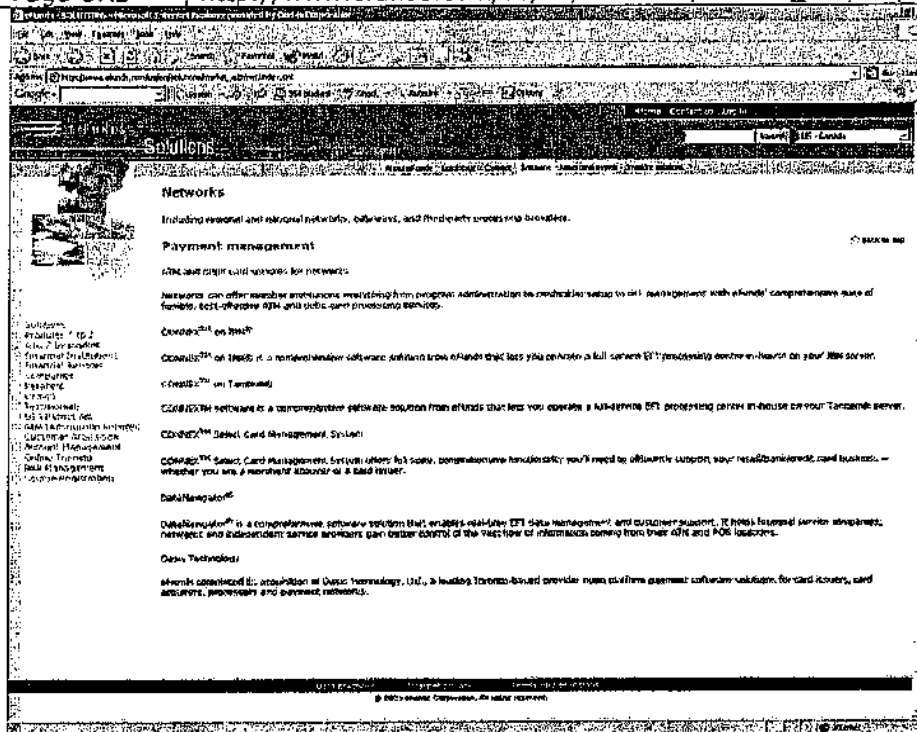
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Address 1: _____
Address 2: _____
City: _____
State: _____
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I request registration for the above university and agree to pay all payment fees.
I am prepared to pay online (Credit/debit card payment) or by cash.
For the above university at any time without further liability of any kind.

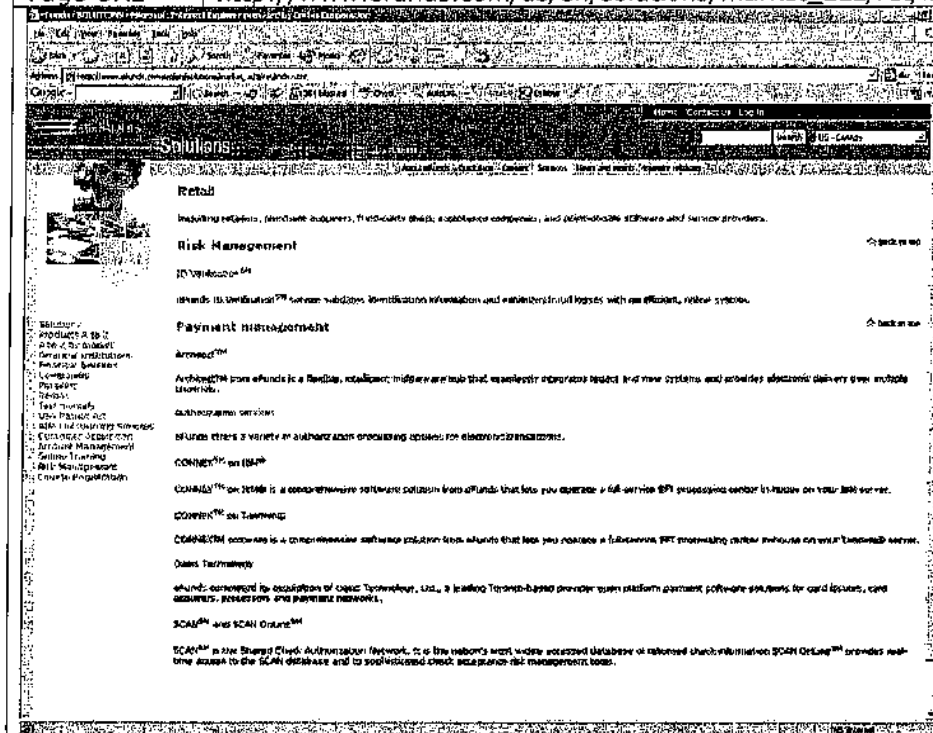
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Solutions

Government
Including federal, state, and local government bodies.

Risk Management
eFunds ID Verification™ service initiates identification information and manages fraud losses with an efficient, secure system.

Payment Management
eFunds government services, one of the best providers in the Electronic Remittance Transfer (ERT) industry, provides state and county governments with processing and support for automatic fund clearing and auto clearing, and offers professional services for applying financial technologies to government projects.

Navigation: Home | About Us | Contact Us | Privacy Policy | Terms of Service | Site Map

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About eFunds

Thank you for your interest in eFunds!

We welcome your inquiries and requests for additional information. Because our goal is to respond as quickly as possible to you, please select the appropriate area below to direct your inquiry or request.

Products and integrated solutions

Any product or solution

Public relations

Request a press kit

Submit general inquiries about eFunds

Investor relations

Request an investor kit

Submit general inquiries

Human resources

Submit inquiries or general inquiries (to submit your resume, please click the [link](#) you prefer)

Webmaster

Submit questions or comments about this site or performance

Additional

Contact eFunds for any other inquiries other than specified above

eFunds Corporate office

10000 Corporate Blvd, Suite 200
 95021 North San Jose, CA 95021
 San Jose, CA 95021
 Telephone: +1-408-625-7700



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Thank you for your interest in efunds. Because we want to be sure you receive a prompt response, please complete the information below.

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Email:

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Address 2:

City:

State:

ZIP/Postal code:

Province:

Country:

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ABOUT eFUNDS

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Email:

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Providing integrated solutions that solve your business needs and strengthen your profitability

Innovative. Reliable. Flexible. Welcome to eFunds, where we deliver integrated information, payment, and technology solutions that strengthen our customers' overall profitability through increased revenue, reduced costs, and improved operations efficiency and technology performance.

Our customers include financial institutions, financial services companies, electronic funds networks, retailers, government agencies, e-commerce providers and other businesses around the world.

We deliver our information, payment, and technology solutions through any combination of our four capabilities or capabilities, which are:

- Risk Management** - We provide data, data analysis tools and controls, and a wealth-less analytics team to help our customers make informed decisions about the risk and opportunity associated with transactions and transactions.
- Hardware, Payments** - From with a robust, established suite of open bank enterprise payment platform solutions, eFunds brings you secure, reliable software and industry-leading bi processing services for electronic payment transactions, as well as network connectivity, debit card issuing/issuing services and ACH processing. Our eFunds™ and eFunds™ software solutions lead the industry in reliability and functionality, and our customers more reliability and more than ever before.
- ATM Solutions** - Improve customer service, increase risk, and reduce your time of ATM transactions, while spending more time at your expense in taking advantage of our eFunds ATM request, eFunds, eFunds, a comprehensive suite of managed services - from consulting to turnkey outsourcing - that allows you to concentrate on your core business, rather than your ATM channel.
- Global Outsourcing Solutions** - We help businesses succeed by providing a suite of cost-effective, low risk, high value-added services. Our services span across the entire customer account lifecycle, from a combination of our contact center, back office, and IT service capabilities. We support business processes from account activation and customer care to account retention or rehabilitation. Our passion for execution and a proven track record inspire confidence in our clients.

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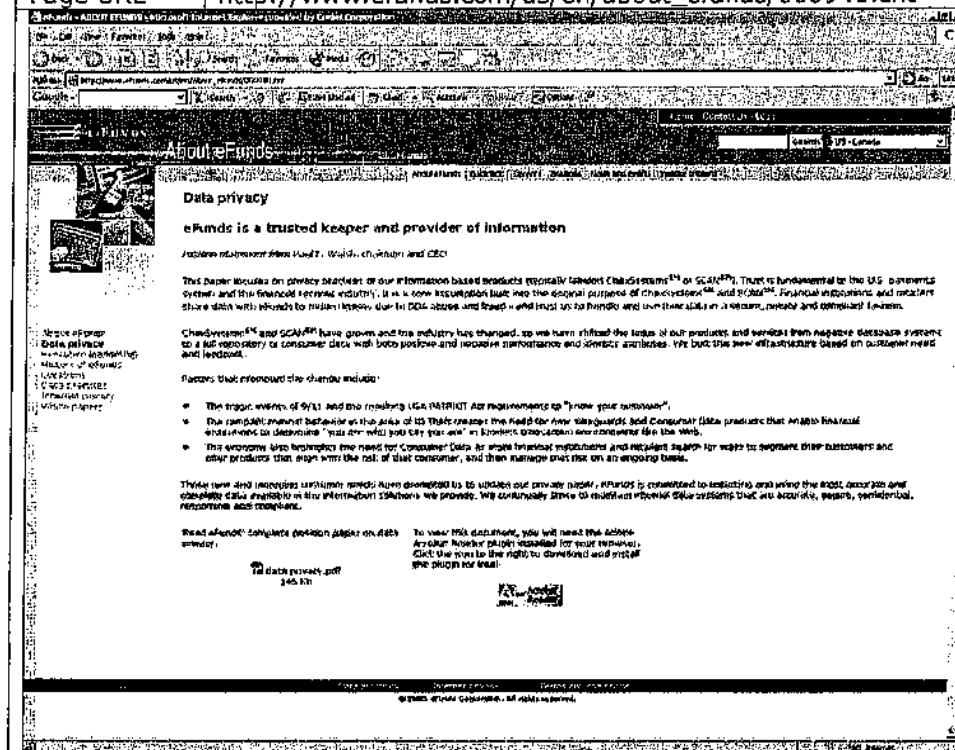
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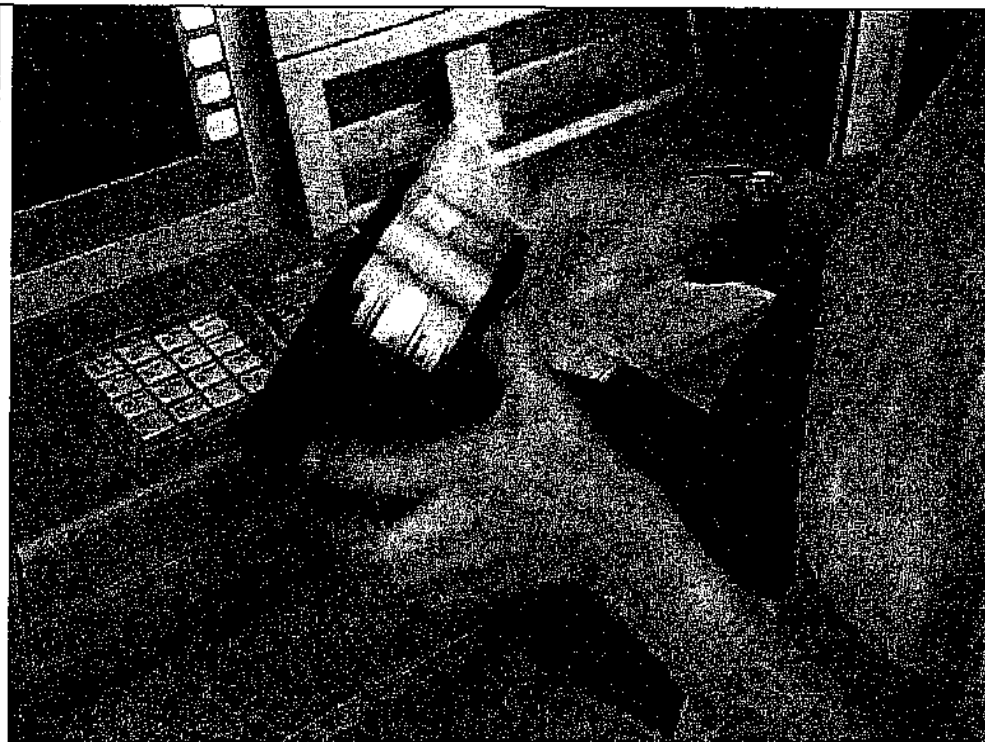
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About eFunds

Executive leadership

Paul F. Walsh, Chairman and Chief Executive Officer

Paul Walsh is Chairman and Chief Executive Officer of eFunds Corporation, a leading provider of web-based investment services. He has over 20 years of experience in the financial services industry, including 10 years at eFunds.

Walsh was named Chairman of eFunds in 2002 and Chief Executive Officer in 2003. He has a degree in Business Administration from the University of Maryland.

Prior to eFunds, Walsh was Chairman and CEO of eFunds Corporation, a provider of electronic payments and services based in Portland, ME. From 1999 to 2000, Walsh served as Chairman of eFunds, a private equity firm, funded in part by BankBoston Capital and Perich Partners. From 1995 to 1998, Walsh was President and CEO of eFunds Corporation, a market leader in the US e-pay industry. Walsh's experience also includes senior positions at several of America's largest financial institutions, including the CEO for the Investor Services and Diversified Services groups of SunLife (1990-1993), head of Capital Management and Trust at SunLife (1987-1990), and multiple positions for Citicorp (1978-1987), including CEO of Citicorp's Trust in America.

Walsh currently serves on the Board of Directors of eFunds, Inc. He holds a B.S. in Management from Tufts University and an MBA with honors from Boston University.

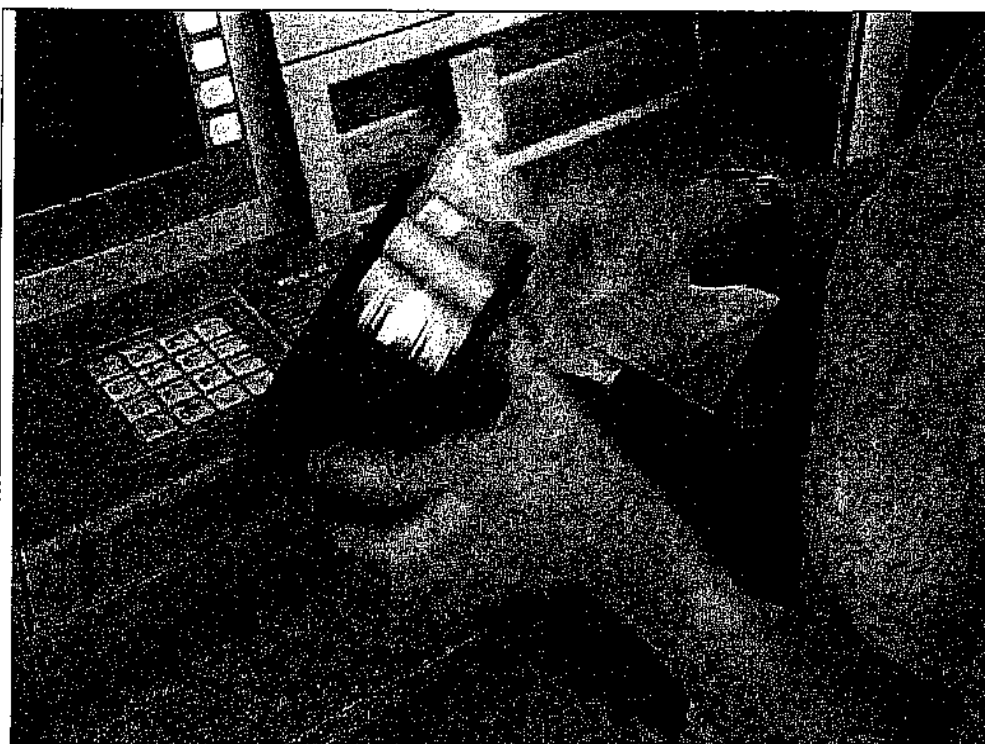
Walsh has been married to Jane for 20 years and has four grown children, Laura, Brian, David, and Dylan.

George W. Gresham, Senior Vice President, Finance, Chief Financial Officer

As Chief Financial Officer for eFunds, George Gresham is responsible for overseeing eFunds' financial operations and managing growth initiatives to generate solid shareholder returns.

Gresham will be instrumental in implementing the operational cost control initiatives into the financial operations of the company. He will also continue to oversee the Company's continuous improvement processes in all of the operating divisions. Gresham is a strong team player and believes that effective communication is essential to develop and manage new operating systems with better teamwork in others.

Previously, Gresham worked for over 10 years with eFunds in Finance as Finance Manager of Insurance and Advisory Services. During his tenure, Gresham was



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About eFunds

eFunds evolved from familiar components

We may be a relatively new company, but some of the components that went into eFunds have a lot of history behind them in serving the financial and retail industries. Here are some of the technologies:

Financial industry's leading bank, placed in June 2000 as the financial industry market. Following the IPO, eFunds' acquisition from Citicorp Capital was (NYSE: CXC) was completed in December 2000.

Deloitte Corporation announced the formation of eFunds in April 2000, bringing together some of the strongest players in risk management and financial transaction processing services that had been used as distinct businesses within Citicorp. In January 2000, eFunds Technology Partners - another Deloitte unit - was combined with eFunds to add professional services and business process outsourcing capabilities to the new business.

Components brought together to create eFunds include:

SCANSM

- Most widely accepted check verification network in the United States
- Began in 1985
- Today serves more than 65,000 retail locations and 12 of the nation's top 50 retailers

CheckSystemsSM

- Leading check verification and risk management services in the United States
- Began in 1971
- Today serves more than 8,500 financial services companies representing over 100,000 branch locations

Deluxe Electronic Payment Systems

- Largest third-party EFT processor in the United States
- Began in 1976
- User and provider of award-winning COMETSM EFT processing software, which is used to process more than 30 billion transactions a year around the world
- Provider of ACH processing services

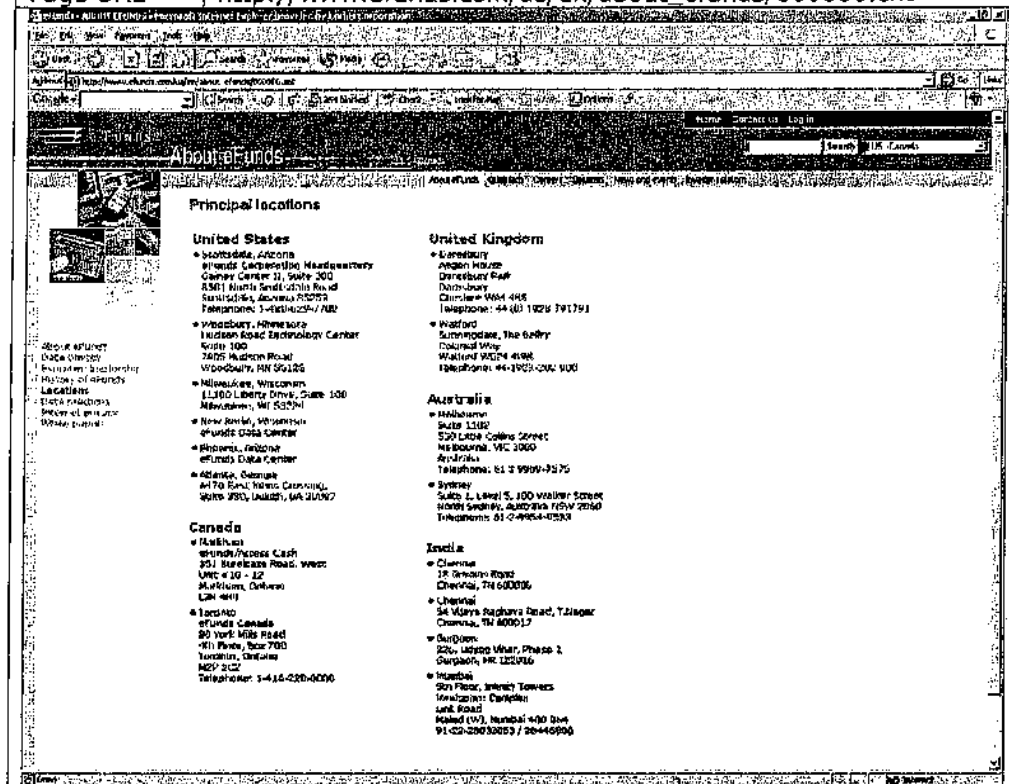
DebitBureau[®]

- Most comprehensive source of debit data used for decision support
- Created in 1978
- Consists of more than 2 billion consumer records received from financial, retail, and government sources

eFunds "Classic"

- Leading electronic check conversion technology

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About eFunds

Data practices

Integrity

We act with integrity in all that we do.

To our customers and partners:

eFunds is committed to collecting and using the most accurate and complete data available in the information environment we provide. By working with reliable partners and abiding our commitment to integrity and acknowledging the effects of our decision based on customer, we help optimize your experience position and further your business objectives.

To the consumer:

eFunds strives to ensure that data we manage is secure, accurate, reliable, and consistently accessible to you. We strive to ensure our data is reliable, accurate, and to address our customers, you, and ourselves on the usefulness and effectiveness of our products.

To our associates:

At eFunds, our products have the potential to affect consumers in many ways. As the individuals who make up eFunds, we must each understand how our business impacts individual consumers and strive to maintain internal data systems that are accurate, secure, confidential, responsive, and consistent.

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efunds.com

About efunds

Internet privacy

At efunds, we take your privacy very seriously. We are committed to using technology that gives you the safest online experience available, and our Internet Privacy Policy will help you understand how efunds and its subsidiaries collect, use, and safeguard consumer and notice information provided through any efunds website. Our Internet Privacy Policy addresses the following areas, each of which is described in greater detail below:

- Consumer reporting system, established by statute
- Collection and use of non-identifiable information
- Use of cookies
- Personal information you choose to provide
- Information security
- Correcting data/errors
- Children using efunds website
- Other websites linked to efunds website
- Policy and procedure enforcement
- Your acceptance of these terms
- Additional information on efunds privacy and data usage policies
- Limitations on advertising
- Containing or correcting consumer reports

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Consumer reporting agencies operated by efunds

efunds owns and operates two consumer reporting agencies (CRAs) - Deposit Payment Protection Services, which operates the SafeIDSM network, and CheckSystemsSM. The Federal Fair Credit Reporting Act (FCRA) and other applicable laws govern these two CRAs. For more information about the FCRA, visit www.fticons.gov.

Collection and use of non-identifiable information

To ensure your online privacy, efunds does not collect personal information without your knowledge. Each time you visit one of our websites, our servers recognize and record the website you came from, and the website you visit when leaving. efunds uses this information in aggregate to determine the overall usage of our sites and to help us improve the overall effectiveness of our web presence.

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About eFunds

White papers

To view these documents, you will need the free add-on Internet Explorer. Click the icon to the right to download and install the software.

Why America Wins with Outsourcing

The debate about US companies sending work to India and other low-cost locations has been heating up in recent months. With new government legislation to protect federal contracts from off-shore competition, however, doing our business in the benefits offshore outsourcing offers US businesses, or to the advantages of globalization, is a short-term and short-sighted approach. Download the white paper.

eFunds and Data Privacy

This paper focuses on privacy practices of our information-based products (especially labeled CheckVantage™ or SCAM™). There is fundamental to the U.S. payments system and the financial services industry. It is a core assumption built into the original purpose of CheckVantage™ and SCAM™. Financial institutions and retailers there place most of funds to reduce fraud due to BDA abuse and fraud - and put us to handle and use their data in a secure, private and compliant fashion. Download the white paper.

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News & Events

EFunds Corporation regularly advertises new industry events to investors and advisors. These events give you the opportunity to meet decision-makers and ensure that the products and services we offer meet their requirements and those of their customers. If you would like to find out more about EFunds, and the products, solutions we offer, join us at the following events.

Our sales team will be open to you additional events where we will be present.

Public Event

Continuing Event

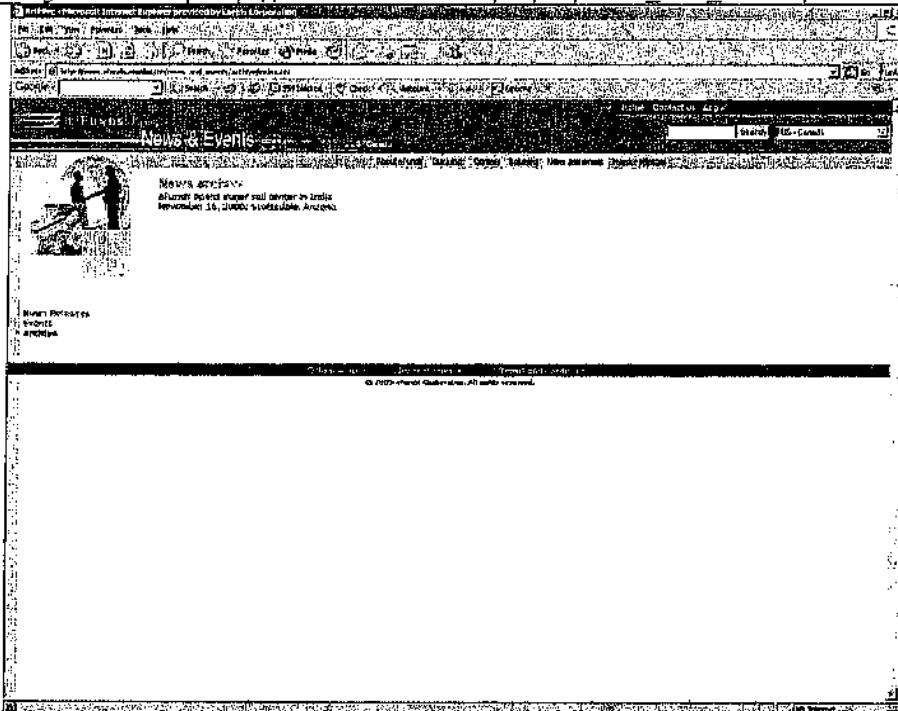
1st Quarter, 2005

Month	Date	Event	Location	Division
March		Customer Advisory Board - West Coast	Scottsdale, AZ	West - West
March		Customer Advisory Board - East	Princeton, NJ	EP
March		SAI 2005 Meeting		EP
March	15-17	SAI Annual Meeting	Las Vegas, NV	EP
March	18	Executive Round Meeting	Washington, DC	EP
March	22-23	CAA EP Proceedings Summit	Scottsdale, AZ	EP

2nd Quarter, 2005

Month	Date	Event	Location	Division
April	4-6	Financial	Tampa, FL	West - West
April	10-12	Financial Services	San Antonio, TX	EP
April	11-12	Card & 2004	Las Vegas, NV	EP
April	13-15	ADL Annual Conference	Orlando, FL	EP
April	16-18	USL Conference	San Diego, CA	EP
May	19-21	West	Phoenix, AZ	EP
May	22-24	Comer North East	Orlando, FL	EP
May	25-27	Investment Data Services	Phoenix, AZ	EP
May	28	CO-OP Conference in Silverdale, WA	Chattanooga, TN	EP
June		Upstate / Atlanta	Atlanta, GA	EP
June		CCCC Annual Client Conference	Phoenix, AZ	EP
June		EPG Global	Scottsdale, AZ	EP
June	5-7	EPG 2005 Annual Users Conference	Scottsdale, AZ	EP
June	14-15	USFCA	San Francisco, CA	EP

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News & Events

Events

Events - information regularly updates law industry events as speakers and exhibitors. These events provide the opportunity to meet decision-makers and ensure that law practice and services are often made more relevant and timely of their customers. If you would like to find out more about events and the business practices we offer, join us at the following address:

Be sure to check back often to our website where we'll be adding a new page.

Public Event: ☐

Corporate Event: ☐

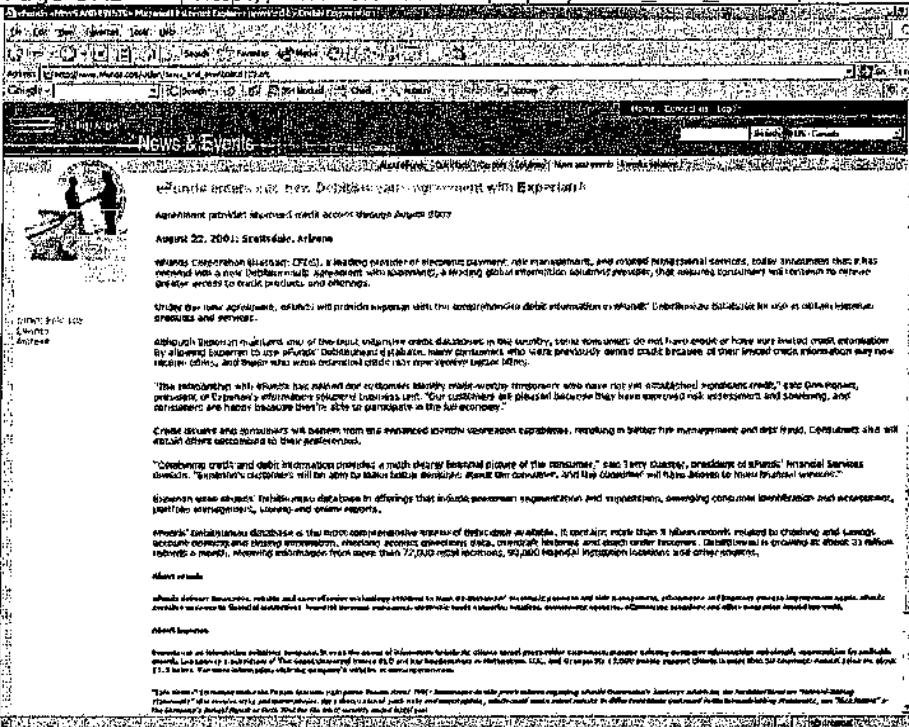
1st Quarter, 2005

Month	Date	Event	Location	Session
March		Customer Advisory Board - Public	Guaymas, AZ	Anti - Money
March		Customer Advisory Board - Anti	Phoenix, AZ	EP
March		Strategic Round (P)		EP
March	18 - 27	EPN Annual Meeting (P)	Las Vegas, NV	EP
March	16	Business Council Meeting (P)	Washington, DC	EP
March	17-18 - 27	2004 EP Business Summit	Scottsdale, AZ	EP

2nd Quarter, 2005

Month	Date	Event	Location	Session
April	4 - 6	Callisto (P)	Phoenix, AZ	PA - FI
April	10 - 12	EMO-HA Partners (P)	San Antonio, TX	EP
April	11 - 13	EMO-HA (P)	San Antonio, TX	EP - OMS
April	13 - 15	ACLU Annual Conference (P)	Orlando, FL	EP
April	18 - 19	EMO Conference (P)	San Diego, CA	EP
May		EMO (P)		EP
May	16 - 17	EMO (P)	Calgary	PA - OMS
May	16 - 17	EMO (P)	Phoenix, AZ	EP
May	18	CO-OP Conference & Symposium (P)	Chicago, IL	EP
June	16	EMO (P)		EP
June		EMO (P)		EP
June	5 - 8	EMO (P)	Scottsdale, AZ	EP
June	8 - 10	EMO (P)	Miami, FL	EP

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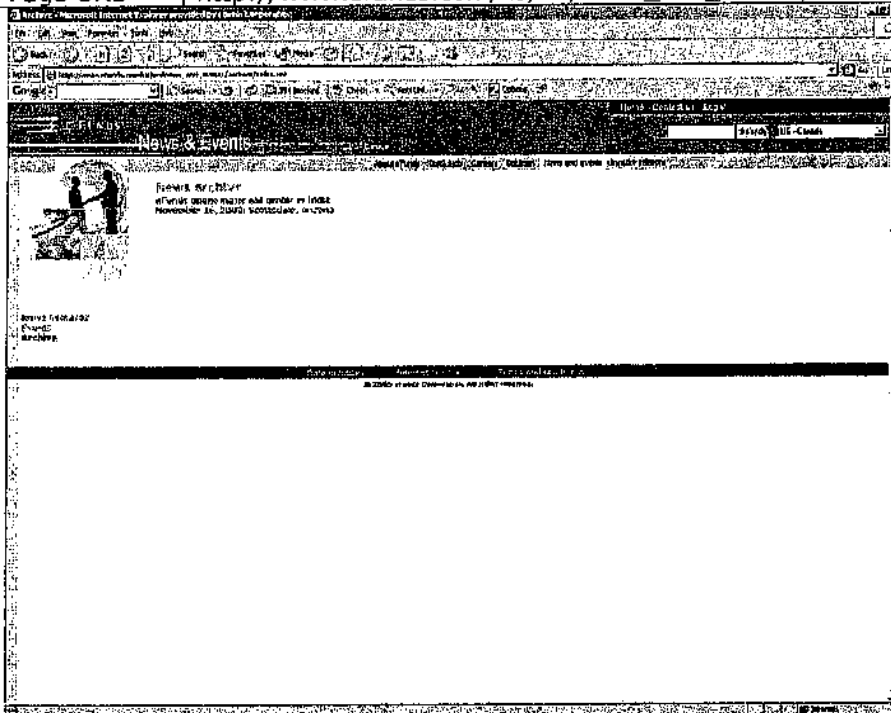




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Picture yourself on the cutting edge of payment technology

Interested in joining the efunds team?

efunds is a leading provider of payment technology solutions. We are looking for talented individuals who are passionate about technology and want to be part of a team that is shaping the future of payments. efunds is currently seeking for smart, energetic people who have an appetite for growth and growth in their technical and professional areas. What you find at efunds is a fast-paced environment where innovation and teamwork thrive, allowing you to achieve your full potential.

Start today by clicking on our current openings and submitting your resume online.

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 Benefits
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Quick Facts

Ever visit an ATM? Write a check? Or use a debit card?

efunds is a leading provider of electronic information, payment, and distribution solutions that strengthen our customers' overall profitability through reduced expense, reduced costs, and improved operating efficiency and technology performance.

Customers who visit an ATM, write a check, use an ATM, deposit a check or debit card at your branch, send or receive an internet "bill," pay, and receive in return with a check, all use a common system to the world of electronic payments and provide a foundation to receive the benefits of electronic transactions and relationships. efunds also provides a foundation for customers to receive the benefits of electronic payments and relationships. efunds also provides a foundation for customers to receive the benefits of electronic payments and relationships.

Markets served

- Financial institutions
- Financial services companies
- Electronic funds networks
- Wireless
- Investment advisors
- 170+ countries around the world

Number of employees

- 4500

Initial public offering

- June 2004 on the Nasdaq Global Market
- January 2004 moved to the NYSE

NYSE symbol

- EFND

Principal locations

USA	Australia	United Kingdom
• Scottsdale, Arizona - executive office	• Sydney	• London
• Minneapolis, St. Paul, Minnesota	• India	• Madrid
• Pasadena, Wisconsin	• Chennai	• Canada
	• Bangalore	• Toronto
	• Mumbai	

Exhibit B

Corbis ID	Certificate Number	Copyright Date
I-186-0197	<u>VA 1-145-485</u>	8/15/2002
AX034121	<u>VA 1-113-639</u>	3/19/2001
O-034-0296	<u>VA 1-145-485</u>	8/15/2002
I-186-0216	<u>VA 1-145-485</u>	8/15/2002
O-049-0488	<u>VA 1-145-485</u>	8/15/2002
AX036153	<u>VAu 546-092</u>	12/12/2001